

**QUINTAIROS, PRIETO, WOOD & BOYER, P.A.**

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*Attorneys for Defendant NAVIENT SOLUTIONS, LLC*

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF NEVADA**

AMANDA GATES,

Plaintiff,

v.

NAVIENT SOLUTIONS, LLC,

Defendant.

Case No. 2:21-CV-01025 -JAD-DJA

**JOINT STIPULATION AND ORDER  
EXTENDING DEADLINE FOR  
NAVIENT SOLUTIONS, INC., TO FILE  
AN ANSWER OR OTHERWISE  
RESPOND TO PLAINTIFF'S  
COMPLAINT**

**(FIRST REQUEST)**

Plaintiff AMANDA GATES ("Plaintiff") and Defendant NAVIENT SOLUTIONS, LLC f/k/a NAVIENT SOLUTIONS, INC. ("NSL"), by and through their respective counsel, stipulate and agree to extend the deadline for Defendant NSL to file an answer or otherwise respond to Plaintiff's Complaint (ECF No. 1.) to and including August 20, 2021.

On May 28, 2021, Plaintiff filed her Complaint and NSL accepted service of the Complaint on June 9, 2021. The claims at issue necessitate additional time for fact-finding and legal analysis by the parties to determine if this matter can be resolved. Plaintiff has no opposition to NSL's request for an extension until August 20, 2021 to file an answer or otherwise respond to Plaintiff's Complaint.

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1 This is the first stipulation for extension of time for NSL to respond to Plaintiff's  
2 Complaint and is being made in good faith and not for purposes of undue delay. No additional  
3 requests for extensions are contemplated.

4 DATED this 5<sup>th</sup> day of August, 2021.

5 **QUINTAIROS, PRIETO, WOOD & BOYER,**  
6 **P.A.**

7 By: /s/ Michael Ayers  
8 Michael Ayers, Esq. (NV Bar No.10851)  
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13 Reno, Nevada 89501  
14 *Attorneys for Defendant*  
15 *NAVIENT SOLUTIONS, LLC*

16 DATED this 5<sup>th</sup> day of August, 2021.

17 **FREEDOM LAW FIRM**

18 By: /s/ Gerardo Avalos  
19 Gerardo Avalos, Esq.  
20 8985 S. Eastern Ave., Ste. 350  
21 Las Vegas, Nevada 89123  
22 *Attorneys for Plaintiff*  
23 *AMANDA GATES*

24 **IT IS SO ORDERED.**

25 Dated this 6<sup>th</sup> day of August, 2021.

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28 Daniel J. Albregts  
United States Magistrate Judge